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April 15, 1999

>Dockets Management Branch (HFA-305) >Food and Drug Administration >5630 Fishers Lane, Room 1061 >Rockville, Maryland 20852

Re: Docket # 98N-1038, "Irradiation in the Production, >Processing, and Handling of Food"

>To whom it may concern:

- The FDA should retain the current labeling law, the >current terminology of "treated with radiation" or "treated >by irradiation," and the use of the radura symbol on all >irradiated whole foods.
- Regarding the issue of labeling, in its initial >petition, the FDA concluded that irradiation was a "material >fact" about the processing of a food, and thus should be >disclosed. The material fact remains; therefore, labeling >should remain. Consumer acceptability, storage qualities and >nutrients are affected.
- Whether or not the FDA has approved irradiation as >safe, it remains a new technology with no long-term human >feeding studies. Consumers certainly have a right to know if >this process has been used on their food.
- As to the kind of label used, I believe that label >should be large enough to be readily visible to the >consumer, on the front of the package. The label contains >important information regarding the processing of the >contents. For displayed whole foods such as produce, a >prominent informational display similar to that used for >meat's should be used (but containing the term "irradiation" >and the radura).
- Because of the newness of the technology and the need >to assess the public health effects of widespread use of >irradiated foods, I believe that the FDA's labeling >requirement should not be permitted to expire.

Steve Mayer 98N-1038

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